

## Clibanoff, Andrew

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**Subject:** FW: Former BP Marcus Hook Refinery 2011 Report

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**From:** Jazic, Sasa <Sasa.Jazic@bp.com>  
**Sent:** Tuesday, January 08, 2019 11:05 AM  
**To:** Clibanoff, Andrew <Clibanoff.Andrew@epa.gov>  
**Cc:** Wheeler, Kevin <kwheeler@sovcon.com>; Bryant, Iain (Sovereign Consulting Inc.) <ibryant@sovcon.com>  
**Subject:** RE: Former BP Marcus Hook Refinery 2011 Report

Hi Andy,

Please see below the information you requested in regard to financial assurance for implementation of the current PRCP requirements for the refinery/Site.

- Routine maintenance, inspections, and annual report = \$30k (annual)
- Unless otherwise agreed with Monroe Energy, BP will be leading implementation of the PRCP requirements although Monroe is responsible for maintaining existing refinery institutional controls (e.g. OSHA compliant occupational controls) and engineering controls (e.g. building pressurization) that the PRCP relies upon.

As we have previously discussed, the Sinclair Acid Plant property will be handled as a separate Act 2 case with PADEP which may also require a separate environmental covenant. At this time BP does not have a defined scope of work and cost estimate for the investigation and any potential remediation. Scoping and initiation of the investigation work by BP is pending completion of site characterization of the upgradient East Tenth Street/FMC property by others. BP plans to discuss the investigation with PADEP and USEPA prior to submitting a Notice of Intent to Remediate (NIR) and initiating field work. With regard to your comment about lead, "yes" we plan to implement the same pathway elimination approach that we applied for the refinery property Act 2 case.

Please let me know if you need any further information to support completion of the Statement of Basis and Final Determination.

Regards,  
Sasa

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**From:** Clibanoff, Andrew [<mailto:Clibanoff.Andrew@epa.gov>]  
**Sent:** Thursday, December 20, 2018 11:02 AM  
**To:** Bryant, Iain (Sovereign Consulting Inc.)  
**Cc:** Wheeler, Kevin; Jazic, Sasa  
**Subject:** RE: Former BP Marcus Hook Refinery 2011 Report

Iain,

Thanks so much for the quick response.

I thought of one more thing I may need for the Statement of Basis. For the Financial Assurance section, would it be possible to get a cost estimate for the costs associated with completing the PRCP required inspections, maintenance, etc. and also an estimate of the cost of further investigation and potential remediation in the former Sinclair Acid Plant. Will BP continue to be responsible for conducting those PCRCP requirements in the future? I noticed an elevated lead concentration in one of the soil samples collected by ConocoPhillips in 2005 (05-ACID-16) and wasn't sure if you were planning on handling that in a similar fashion to the MSC exceedances in the rest of the refinery (i.e., further investigation/surface cover if needed).

Thanks again.  
Enjoy the holidays!

Andy